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9 *Security National Insurance Company*

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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 CARMEN IOVINO; and TOPNOTCH  
SERVICES, INC.,

14 Plaintiffs,

15 v.

16 AMTRUST FINANCIAL SERVICES, INC.;  
17 SECURITY NATIONAL INSURANCE  
COMPANY; AMTRUST NORTH AMERICA,  
18 INC.; DOES I through V and ROE  
CORPORATIONS VI through X, inclusive,

19 Defendants.

20 SECURITY NATIONAL INSURANCE  
COMPANY,

21 Counterclaimant,

22 v.

23 CARMEN IOVINO,

24 Counterdefendant.  
25

Case No. 2:22-cv-01974-APG-NJK

ORDER **TO EXTEND DEADLINE**  
**TO FILE JOINT PRETRIAL ORDER**  
**(FIRST REQUEST)**

26 Defendants AmTrust Financial Services, Inc. (“AFSI”) and Security National Insurance  
27 Company (“SNIC”), and AmTrust North America, Inc. (“ANA”) (collectively “Defendants”) and  
28 Plaintiff Carmen Iovino (“Plaintiff”), by and through their respective counsel of record, hereby

1 stipulate and agree to extend the deadline to file a Joint Pretrial Order pursuant to LR 16-3 until  
2 thirty (30) days after the Court's decision on Plaintiff's currently pending motion for reconsideration  
3 [ECF 210] as follows:

4 1. On September 26, 2024, Plaintiff filed a motion for summary judgment as to liability  
5 only against all Defendants on all of Plaintiff's causes of action [ECF 161] and a motion to strike  
6 Defendants' answer [ECF 162].

7 2. On September 26, 2024, Defendants filed a motion for summary judgment requesting  
8 the court: (a) enter judgment in favor of AFSI as to all of Plaintiff's causes of action; (b) enter  
9 judgment in favor of Defendants on Plaintiff's causes of action for bad faith, violation of Nevada's  
10 unfair trade practices act; and fraud; and (3) strike Plaintiff's prayer for punitive damages [ECF 163].

11 3. On February 3, 2025, Plaintiff filed a motion for summary judgment requesting the  
12 court enter judgment in Plaintiff's favor on Defendant SNIC's counterclaim against Plaintiff.

13 4. On March 13, 2025, the Court entered an order on the parties' dispositive motions  
14 [ECF 161 & ECF 163] as well as Plaintiff's motion to strike [ECF 162] wherein the Court: (a)  
15 granted summary judgment in favor of Plaintiff on liability only for breach of contract against SNIC;  
16 (b) granted summary judgment in favor of AFSI on all of Plaintiff's causes of action; (c) granted  
17 summary judgment in favor of ANA and SNIC on Plaintiff's fraud cause of action; (d) granted  
18 summary judgment in favor of ANA on Plaintiff's cause of action for violation of Nevada's unfair  
19 claim practices act; (e) granted summary judgment in favor of all Defendants on Plaintiff's bad faith  
20 cause of action specific to the failure to pay Plaintiff's medical bills; and (f) denied Plaintiff's motion  
21 to strike [ECF 207].

22 5. On March 24, 2025, the Court entered an order that, *inter alia*, granted summary  
23 judgment in favor of Plaintiff on SNIC's counterclaim [ECF 209].

24 6. On March 27, 2025, Plaintiff filed a motion requesting the Court to reconsider its  
25 order: (a) granting summary judgment in favor of Defendants on Plaintiff's bad faith cause of action  
26 specific to the failure to pay Plaintiff's medical bills; (b) granting summary judgment in favor of  
27 AFSI on all of Plaintiff's causes of action; and (c) denying Plaintiff's motion to strike. [ECF 210].

28 7. In light of the impact the Court's decision on the motion for reconsideration could

1 have on the trial in this matter, including the parties who would be going to trial, the factual and  
 2 legal issues that would be adjudicated; the witnesses who will be called to testify, the trial exhibits;  
 3 the page and line deposition designations; as well as the number of days that may be needed for  
 4 trial, the parties stipulate and agree that the deadline for the filing of the Joint Pretrial Order shall  
 5 be extended to thirty (30) days after the Court issues its order on Plaintiff's currently pending motion  
 6 for reconsideration [ECF 210].

7 8. This stipulation is submitted in compliance with LR IA 6-1 and LR IA 6-2. Good  
 8 cause exists for the requested extension, the time requested is not excessive, and all counsel have  
 9 been cooperative in agreeing to the same.

10 9. This is the parties' first request for extension of these deadlines.

11 Dated this 17<sup>th</sup> day of April, 2025.

Dated this 17<sup>th</sup> day of April, 2025.

12  
 13 WILSON, ELSER, MOSKOWITZ,  
 EDELMAN & DICKER LLP

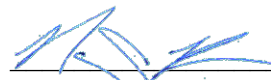
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 22  
 23 **ORDER**

24 **IT IS SO ORDERED:**

25   
 26 Nancy J. Koppe  
 United States Magistrate Judge

27 DATED: April 21, 2025  
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